

Exhibit H

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Joyceland Fisher, as next of friend and mother of two minor children, D.G. and P.P., [REDACTED] Flint, MI 48507, claimant's counsel can be contacted at 212-605-6200. Joyceland Fisher has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her children and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: D.G. – [REDACTED] 2001, P.P. – [REDACTED] 2003

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.

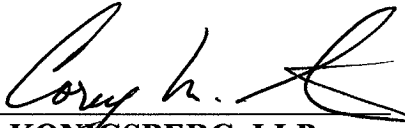
8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimants have experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimants have experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
 - r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - u. Adam Rosenthal, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 4000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 4000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/21/2017

STATEMENT OF FACTS AND BASIS FOR CLAIM

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Joyce Kline, as next of friend and legal guardian of one minor child, S.E., [REDACTED] Flint, MI 48505, claimant's counsel can be contacted at 212-605-6200. Joyce Kline has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her child and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: S.E. – [REDACTED] 2008

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.


8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimant has experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimant has experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
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- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
 - r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
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 - v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 2000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 2000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/21/2017

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ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Josephine Seay, as next of friend and mother of one minor child, J.S., [REDACTED] Flint, MI 48505, claimant's counsel can be contacted at 212-605-6200. Josephine Seay has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her child and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: J.S. – [REDACTED] 2005

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

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8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimant has experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimant has experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

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12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 2000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 2000000 (at present)
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STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Joseph Belin, as next of friend and father of four minor children, A.B., S.B., Z.B.1 and Z.B.2, [REDACTED] Flint, MI 48505, claimant's counsel can be contacted at 212-605-6200. Joseph Belin has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent his children and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: S.B. – [REDACTED] 2001, A.B. – [REDACTED] 2003, Z.B.1 – [REDACTED] 2005, Z.B.2 – [REDACTED] 2006

5. Marital Status: Single

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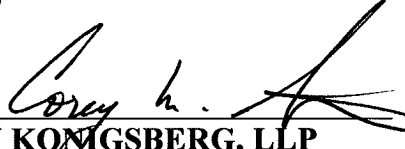
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 - aa. U.S. Senator Debbie Stabenow, Washington DC
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12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 8000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 8000000 (at present)
13. A. Signature of duly authorized agent: 
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ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Jolynn Jackson, as next of friend and mother of two minor children, B.J. and L.J., [REDACTED] Grand Blanc, MI 48439, claimant's counsel can be contacted at 212-605-6200. Jolynn Jackson has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her children and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: B.J. – [REDACTED] 2012, L.J. – [REDACTED] 2015

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.


8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimants have experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimants have experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

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14. Date of Signature: 4/21/2017

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ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Joline Martin, as next of friend and mother of one minor child, E.P., [REDACTED] Flint, MI 48506, claimant's counsel can be contacted at 212-605-6200. Joline Martin has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her child and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: E.P. – [REDACTED] 2009

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.


8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimant has experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimant has experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

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 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 2000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 2000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/21/2017

STATEMENT OF FACTS AND BASIS FOR CLAIM

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**


STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).
2. Claimant and Claimant's Representative: Johnny Roberts Jr., as next of friend and father of one minor child, J.R., [REDACTED] Mount Morris, MI 48458, claimant's counsel can be contacted at 212-605-6200. Johnny Roberts Jr. has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent his child and act on their behalf.
3. Type of employment: Minor Children – No Employment
4. Date(s) of Birth: J.R. – [REDACTED] 2006
5. Marital Status: Single
6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.
7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.
8. Basis of Claim: Negligence. The SF-95 required details are described below.
9. Property Damage: None

10. Nature and extent of each injury: The claimant has experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimant has experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
 - r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - u. Adam Rosenthal, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 2000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 2000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/21/2017

STATEMENT OF FACTS AND BASIS FOR CLAIM

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Johnnie Vary, as next of friend and mother of three minor children, J.V., J.J. and A.T., [REDACTED] Flint, MI 48506, claimant's counsel can be contacted at 212-605-6200. Johnnie Vary has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her children and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: A.T. – [REDACTED] 2009, J.J. – [REDACTED] 2003, J.V. – [REDACTED] 2001

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.


8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimants have experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimants have experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
 - r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - u. Adam Rosenthal, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 6000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 6000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/21/2017

STATEMENT OF FACTS AND BASIS FOR CLAIM

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: John Lee Webb Jr., as next of friend and father of one minor child, J.W., [REDACTED] Flint, MI 48504, claimant's counsel can be contacted at 212-605-6200. John Lee Webb Jr. has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent his child and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: J.W. – [REDACTED] 2003

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.


8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimant has experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimant has experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
 - r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - u. Adam Rosenthal, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 2000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 2000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/21/2017

STATEMENT OF FACTS AND BASIS FOR CLAIM

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Joewillie Broadnax, as next of friend and mother of three minor children, J.M. 1, J.M. 2, and J.M. 3, [REDACTED] Flint, MI 48505, claimant's counsel can be contacted at 212-605-6200. Joewillie Broadnax has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her children and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: J.M.1 – [REDACTED] 2010, J.M.2 – [REDACTED] 2008, J.M.3 – [REDACTED] 2015

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.


8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimants have experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimants have experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
 - r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - u. Adam Rosenthal, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 6000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 6000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/21/2017

STATEMENT OF FACTS AND BASIS FOR CLAIM

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Joesy Gindlesperger, as next of friend and mother of one minor child, J.G., [REDACTED] Brockway, PA 15824, claimant's counsel can be contacted at 212-605-6200. Joesy Gindlesperger has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her child and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: J.G. – [REDACTED] 2012

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.

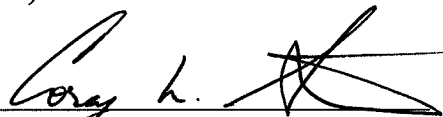
8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimant has experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimant has experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
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- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
 - r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
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 - w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 2000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 2000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/21/2017

STATEMENT OF FACTS AND BASIS FOR CLAIM

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Joel Morris, as next of friend and father of five minor children, L.M. 1, L.M. 2, L.M. 3, L.M. 4, and L.M. 5, [REDACTED] Flint, MI 48506, claimant's counsel can be contacted at 212-605-6200. Joel Morris has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent his children and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: L.M.1 – [REDACTED] 2009, L.M.2 – [REDACTED] 2006, L.M.3 – [REDACTED] 2014, L.M.4 – [REDACTED] 2011, L.M.5 – [REDACTED] 2004

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.


8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimants have experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimants have experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
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- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI

- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI
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 - r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - u. Adam Rosenthal, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 10000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 10000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/21/2017

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

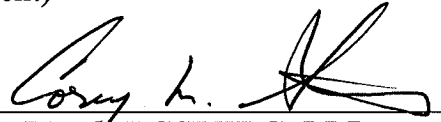
STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).
2. Claimant and Claimant's Representative: Jodie Woodworth, as next of friend and mother of one minor child, G.A., [REDACTED] Linden, MI 48451, claimant's counsel can be contacted at 212-605-6200. Jodie Woodworth has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her child and act on their behalf.
3. Type of employment: Minor Children – No Employment
4. Date(s) of Birth: G.M. – [REDACTED] 2015
5. Marital Status: Single
6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.
7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.
8. Basis of Claim: Negligence. The SF-95 required details are described below.
9. Property Damage: None

10. Nature and extent of each injury: The claimant has experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimant has experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
 - r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - u. Adam Rosenthal, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 2000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 2000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/21/2017

STATEMENT OF FACTS AND BASIS FOR CLAIM

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Jodi Benedict, as next of friend and mother of two minor children, A.B. and J.H., [REDACTED] Flint, MI 48430, claimant's counsel can be contacted at 212-605-6200. Jodi Benedict has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her children and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: A.B. – [REDACTED] 2008, J.H. – [REDACTED] 2006

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.


8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimants have experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimants have experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
 - r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
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 - v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 4000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 4000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/21/2017

STATEMENT OF FACTS AND BASIS FOR CLAIM

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**


STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).
2. Claimant and Claimant's Representative: Jill Groves, as next of friend and mother of two minor children, A.G. and C.G., [REDACTED] Flint, MI 48503, claimant's counsel can be contacted at 212-605-6200. Jill Groves has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her children and act on their behalf.
3. Type of employment: Minor Children – No Employment
4. Date(s) of Birth: A.G. – [REDACTED] 2015, C.G. – [REDACTED] 2012
5. Marital Status: Single
6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.
7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.
8. Basis of Claim: Negligence. The SF-95 required details are described below.
9. Property Damage: None

10. Nature and extent of each injury: The claimants have experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimants have experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
 - r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - u. Adam Rosenthal, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 4000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 4000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/21/2017

STATEMENT OF FACTS AND BASIS FOR CLAIM

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Jessica Webber, as next of friend and mother of one minor child, N.M., [REDACTED] Thompsonville, MI 49683, claimant's counsel can be contacted at 212-605-6200. Jessica Webber has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her child and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: N.M. – [REDACTED] 2009

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.

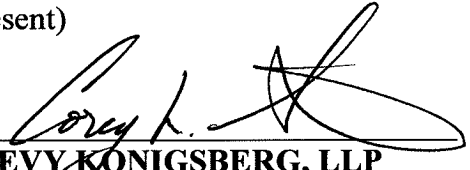
8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimant has experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimant has experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
 - r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
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 - u. Adam Rosenthal, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 2000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 2000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/21/2017

STATEMENT OF FACTS AND BASIS FOR CLAIM

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Jessica Washington, as next of friend and mother of three minor children, J.E.1, J.E.2 and R.E., [REDACTED] Flint, MI 48505, claimant's counsel can be contacted at 212-605-6200. Jessica Washington has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her children and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: J.E.2 – [REDACTED] 2014, J.E.1 – [REDACTED] 2010, R.E. – [REDACTED] 2012

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.


8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimants have experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimants have experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
 - r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
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 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 6000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 6000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/21/2017

STATEMENT OF FACTS AND BASIS FOR CLAIM

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Jessica Strong, as next of friend and mother of one minor child, E.S., [REDACTED] Flint, MI 48506, claimant's counsel can be contacted at 212-605-6200. Jessica Strong has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her child and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: E.S. – [REDACTED] 2014

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.


8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimant has experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimant has experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

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- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
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- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
 - r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - u. Adam Rosenthal, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 2000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 2000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/21/2017

STATEMENT OF FACTS AND BASIS FOR CLAIM

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Jessica Pintacura, as next of friend and mother of three minor children, F.J., K.J. and I.J., [REDACTED] Flint, MI 48507, claimant's counsel can be contacted at 212-605-6200. Jessica Pintacura has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her children and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: K.J. – [REDACTED] 2008, F.J. – [REDACTED] 2009, I.J. – [REDACTED] 2013

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.

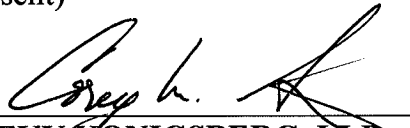
8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimants have experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimants have experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
 - r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - u. Adam Rosenthal, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 6000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 6000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/21/2017

STATEMENT OF FACTS AND BASIS FOR CLAIM

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Jessica Pepler, as next of friend and mother of one minor child, J.P., [REDACTED] Flint, MI 48503, claimant's counsel can be contacted at 212-605-6200. Jessica Pepler has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her child and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: J.P. – [REDACTED] 2010

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.


8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimant has experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimant has experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
 - r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - u. Adam Rosenthal, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 2000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 2000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/21/2017

STATEMENT OF FACTS AND BASIS FOR CLAIM

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Jessica Matthews, as next of friend and mother of one minor child, K.P., [REDACTED] Flint, MI 48502, claimant's counsel can be contacted at 212-605-6200. Jessica Matthews has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her child and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: K.P. – [REDACTED] 2007

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.


8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimant has experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimant has experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
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- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
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- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
 - r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
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 - v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 2000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 2000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/21/2017

STATEMENT OF FACTS AND BASIS FOR CLAIM

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Jessica Johnson, as next of friend and mother of two minor children, N.J. and Y.J., [REDACTED] Jackson, MS 39206, claimant's counsel can be contacted at 212-605-6200. Jessica Johnson has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her children and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: N.J. – [REDACTED]/2012, Y.J. – [REDACTED] 2010

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.


8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimants have experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimants have experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

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- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
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- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
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- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
 - r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
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 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 4000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 4000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/21/2017

STATEMENT OF FACTS AND BASIS FOR CLAIM

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Jessica Horne, as next of friend and mother of five minor children, A.H., D.B., H.H., R.E. and T.B., [REDACTED] Flint, MI 48503, claimant's counsel can be contacted at 212-605-6200. Jessica Horne has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her children and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: R.E. – [REDACTED] 2005, D.K. – [REDACTED] 2009, T.B. – [REDACTED] 2012, A.H. – [REDACTED] 2013, H.H. – [REDACTED] 2014

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.

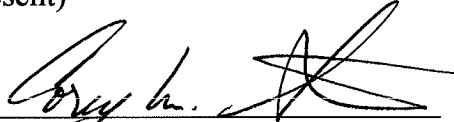
8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimants have experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimants have experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
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- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI
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 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 10000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 10000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/21/2017

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Jessica Helms, as next of friend and mother of one minor child, D.H., [REDACTED] Flint, MI 48507, claimant's counsel can be contacted at 212-605-6200. Jessica Helms has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her child and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: D.H. – [REDACTED] 2005

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.

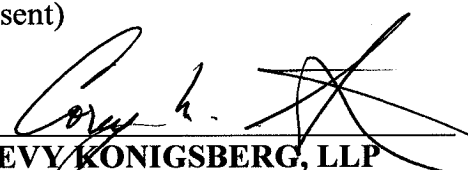
8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimant has experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimant has experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
 - r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - u. Adam Rosenthal, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 2000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 2000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/21/2017

STATEMENT OF FACTS AND BASIS FOR CLAIM

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Jessica Grams, as next of friend and mother of two minor children, K.T. and L.G., [REDACTED] Swartz Creek, MI 48473, claimant's counsel can be contacted at 212-605-6200. Jessica Grams has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her children and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: K.T. – [REDACTED] 2007, L.G. – [REDACTED] 2010

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.


8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimants have experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimants have experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
 - r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - u. Adam Rosenthal, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 4000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 4000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/21/2017

STATEMENT OF FACTS AND BASIS FOR CLAIM

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Jessica Godfrey, as next of friend and mother of two minor children, J.T.1 and J.T.2, [REDACTED] Flint, MI 48506, claimant's counsel can be contacted at 212-605-6200. Jessica Godfrey has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her children and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: J.T.2 – [REDACTED] 2002, J.T.1 – [REDACTED] 2001

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.

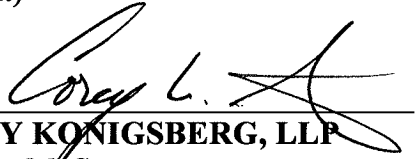
8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimants have experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimants have experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
 - r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - u. Adam Rosenthal, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 4000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 4000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/21/2017

STATEMENT OF FACTS AND BASIS FOR CLAIM

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Jessica Getter, as next of friend and mother of three minor children, J.G. 1, J.G. 2, and T.H., [REDACTED] Flint, MI 45806, claimant's counsel can be contacted at 212-605-6200. Jessica Getter has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her children and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: T.H. – [REDACTED] 2012, J.G.1 – [REDACTED] 2002, J.G.2 – [REDACTED] 2013

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.


8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimants have experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimants have experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
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- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
 - r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - u. Adam Rosenthal, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 6000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 6000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/21/2017

STATEMENT OF FACTS AND BASIS FOR CLAIM

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Jessica Brackins, as next of friend and mother of two minor children, A.B. and S.A., [REDACTED] Flint, MI 48507, claimant's counsel can be contacted at 212-605-6200. Jessica Brackins has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her children and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: S.A. – [REDACTED] 2007, A.B. – [REDACTED] 2002

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.


8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimants have experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimants have experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

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- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
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- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
 - r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
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 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
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 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 4000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 4000000 (at present)
13. A. Signature of duly authorized agent: 
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800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/21/2017

STATEMENT OF FACTS AND BASIS FOR CLAIM

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Jeremy McDowell, as next of friend and father of three minor children, J.M. 1, J.M. 2 and J.M. 3, [REDACTED] Flint, MI 48507, claimant's counsel can be contacted at 212-605-6200. Jeremy McDowell has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent his children and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: J.M.1 – [REDACTED] 2011, J.M.2 – [REDACTED] 2006, J.M.3 – [REDACTED] 2008

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.


8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimants have experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimants have experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

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- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
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- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
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 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
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 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 6000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 6000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/21/2017

STATEMENT OF FACTS AND BASIS FOR CLAIM

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Jenny Staggs, as next of friend and mother of two minor children, I.F. and M.S., [REDACTED] Flint, MI 48507, claimant's counsel can be contacted at 212-605-6200. Jenny Staggs has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her children and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: M.S. – [REDACTED] 2013, I.F. – [REDACTED] 2004

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.


8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimants have experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimants have experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
 - r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - u. Adam Rosenthal, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 4000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 4000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/21/2017

STATEMENT OF FACTS AND BASIS FOR CLAIM

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Jennifer Nudell, as next of friend and mother of two minor children, G.N. and L.N., [REDACTED] Flint, MI 48506, claimant's counsel can be contacted at 212-605-6200. Jennifer Nudell has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her children and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: G.N. – [REDACTED] 2001, L.N. – [REDACTED] 2002

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.

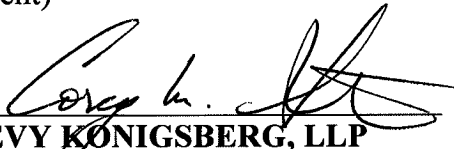
8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimants have experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimants have experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
 - r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - u. Adam Rosenthal, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 4000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 4000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/21/2017

STATEMENT OF FACTS AND BASIS FOR CLAIM

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**


STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).
2. Claimant and Claimant's Representative: Jennifer Husocki, as next of friend and mother of one minor child, M.S., [REDACTED] Flint, MI 48503, claimant's counsel can be contacted at 212-605-6200. Jennifer Husocki has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her child and act on their behalf.
3. Type of employment: Minor Children – No Employment
4. Date(s) of Birth: M.S. – [REDACTED] 2010
5. Marital Status: Single
6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.
7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.
8. Basis of Claim: Negligence. The SF-95 required details are described below.
9. Property Damage: None

10. Nature and extent of each injury: The claimant has experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimant has experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
 - r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
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 - v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 2000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 2000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/21/2017

STATEMENT OF FACTS AND BASIS FOR CLAIM

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

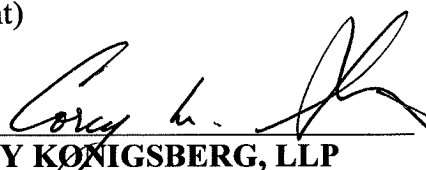
STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).
2. Claimant and Claimant's Representative: Jennifer Barnett, as next of friend and mother of three minor children, A.J., I.J. and J.J., [REDACTED] Flint, MI 48503, claimant's counsel can be contacted at 212-605-6200. Jennifer Barnett has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her children and act on their behalf.
3. Type of employment: Minor Children – No Employment
4. Date(s) of Birth: A.J. – [REDACTED] 2003, I.J. – [REDACTED] 2006, J.J. – [REDACTED] 2001
5. Marital Status: Single
6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.
7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.
8. Basis of Claim: Negligence. The SF-95 required details are described below.
9. Property Damage: None

10. Nature and extent of each injury: The claimants have experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimants have experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
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- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
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- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
 - r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
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 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 6000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 6000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/21/2017

STATEMENT OF FACTS AND BASIS FOR CLAIM

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Jenna Biel, as next of friend and mother of two minor children, J.Z. and J.A., [REDACTED] Flint, MI 48507, claimant's counsel can be contacted at 212-605-6200. Jenna Biel has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her children and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: J.Z. – [REDACTED] 2012, J.A. – [REDACTED] 2011

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.

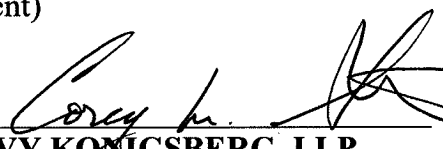
8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimants have experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimants have experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

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- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
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- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
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- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

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 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 4000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 4000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/21/2017

STATEMENT OF FACTS AND BASIS FOR CLAIM

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Jeneyah McDonald, as next of friend and mother of two minor children, J.M. 1 and J.M. 2, [REDACTED] Flint, MI 48505, claimant's counsel can be contacted at 212-605-6200. Jeneyah McDonald has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her children and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: J.M.1 – [REDACTED] 2013, J.M.2 – [REDACTED] 2009

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.


8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimants have experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimants have experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

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- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
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- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

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 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 4000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 4000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/21/2017

STATEMENT OF FACTS AND BASIS FOR CLAIM

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Jeffrey Curl, as next of friend and father of one minor child, J.C., [REDACTED] Flint, MI 48504, claimant's counsel can be contacted at 212-605-6200. Jeffrey Curl has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent his child and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: J.C. – [REDACTED] 2007

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.


8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimant has experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimant has experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
 - r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - u. Adam Rosenthal, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 2000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 2000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/21/2017

STATEMENT OF FACTS AND BASIS FOR CLAIM

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Jeffrey Ampy, as next of friend and father of one minor child, E.A., [REDACTED] Flint, MI 48505, claimant's counsel can be contacted at 212-605-6200. Jeffrey Ampy has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent his child and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: E.A. – [REDACTED] 2010

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.

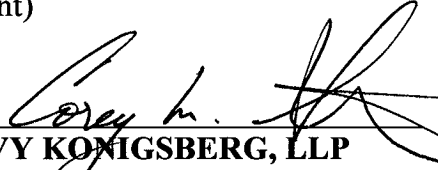
8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimant has experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimant has experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
 - r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - u. Adam Rosenthal, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 2000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 2000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/21/2017

STATEMENT OF FACTS AND BASIS FOR CLAIM

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Jeff Berry, as next of friend and father of one minor child, S.S., [REDACTED] Flint, MI 48504, claimant's counsel can be contacted at 212-605-6200. Jeff Berry has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent his child and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: S.S. – [REDACTED] 2001

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.

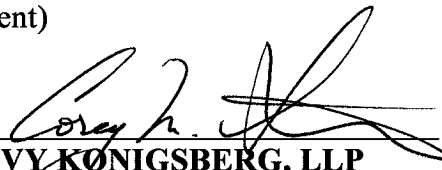
8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimant has experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimant has experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
 - r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - u. Adam Rosenthal, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 2000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 2000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/21/2017

STATEMENT OF FACTS AND BASIS FOR CLAIM

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Jason Coulter, as next of friend and father of three minor children, J.C.1, J.C.2 and A.C., [REDACTED] Flint, MI 48507, claimant's counsel can be contacted at 212-605-6200. Jason Coulter has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent his children and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: A.C. – [REDACTED] 2003, J.C.1 – [REDACTED] 2004, J.C.2 – [REDACTED] 2006

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.


8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimants have experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimants have experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
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- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
 - r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
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 - w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 6000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 6000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/21/2017

STATEMENT OF FACTS AND BASIS FOR CLAIM

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Jeanet Watson, as next of friend and mother of one minor child, A.W., [REDACTED] Vassar, MI 48768, claimant's counsel can be contacted at 212-605-6200. Jeanet Watson has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her child and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: A.W. – [REDACTED] 2012

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.

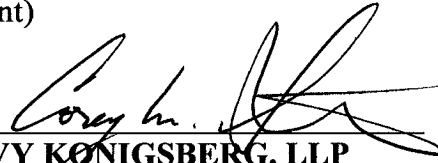
8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimant has experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimant has experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
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 - s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
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 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 2000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 2000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/21/2017

STATEMENT OF FACTS AND BASIS FOR CLAIM

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Jasmine Snow, as next of friend and mother of two minor children, J.S. and L.A., [REDACTED] Flint, MI 48503, claimant's counsel can be contacted at 212-605-6200. Jasmine Snow has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her children and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: J.S. – [REDACTED] 2011, L.A. – [REDACTED] 2014

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.


8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimants have experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimants have experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

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- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
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- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
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 - s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - u. Adam Rosenthal, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 4000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 4000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/21/2017

STATEMENT OF FACTS AND BASIS FOR CLAIM

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Jasmine Lawler, as next of friend and mother of five minor children, J.W.1, J.W.2, J.W.3, J.W.4 and L.W., [REDACTED] Flint, MI 48503, claimant's counsel can be contacted at 212-605-6200. Jasmine Lawler has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her children and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: J.W.1 – [REDACTED] 2011, J.W.2 – [REDACTED] 2012, J.W.3 – [REDACTED] 2009, J.W.4 – [REDACTED] 2009, L.W. – [REDACTED] 2008

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.


8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimants have experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimants have experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI

- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI
 - q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
 - r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - u. Adam Rosenthal, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 10000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 10000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/21/2017

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Jaquita Nelson, as next of friend and mother of three minor children, B.R., C.B. and Q.B., [REDACTED] Flint, MI 48504, claimant's counsel can be contacted at 212-605-6200. Jaquita Nelson has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her children and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: B.R. – [REDACTED] 2006, C.B. – [REDACTED] 2000, Q.B. – [REDACTED] 2003

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.


8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimants have experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimants have experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
 - r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - u. Adam Rosenthal, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 6000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 6000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/21/2017

STATEMENT OF FACTS AND BASIS FOR CLAIM

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Janice Broadnax, as next of friend and mother of two minor children, J.B. 1 and J.B. 2, [REDACTED] Flint, MI 48505, claimant's counsel can be contacted at 212-605-6200. Janice Broadnax has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her children and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: J.B.1 – [REDACTED] 2015, J.B.2 – [REDACTED] 2007

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.


8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimants have experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimants have experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
 - r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - u. Adam Rosenthal, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 4000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 4000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/21/2017

STATEMENT OF FACTS AND BASIS FOR CLAIM

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Janay Coleman-Sanders, as next of friend and mother of two minor children, J.S. and M.S., [REDACTED] Flint, MI 48503, claimant's counsel can be contacted at 212-605-6200. Janay Coleman-Sanders has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her children and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: J.S. – [REDACTED] 2014, M.S. – [REDACTED] 2012

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.


8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimants have experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimants have experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
 - r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - u. Adam Rosenthal, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 4000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 4000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/21/2017

STATEMENT OF FACTS AND BASIS FOR CLAIM

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Janaka Collins, as next of friend and mother of three minor children, J.J., J.B. and V.B., [REDACTED] Flint, MI 48504, claimant's counsel can be contacted at 212-605-6200. Janaka Collins has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her children and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: J.J. – [REDACTED] 2001, J.B. – [REDACTED] 2007, V.B. – [REDACTED] 2004

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.


8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimants have experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimants have experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
 - r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - u. Adam Rosenthal, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 6000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 6000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/21/2017

STATEMENT OF FACTS AND BASIS FOR CLAIM

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Jamilya Whitner, as next of friend and mother of two minor children, A.J. 1 and A.J. 2, [REDACTED] Flint, MI 48505, claimant's counsel can be contacted at 212-605-6200. Jamilya Whitner has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her children and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: A.J.1 – [REDACTED] 2013, A.J.2 – [REDACTED] 2014

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.

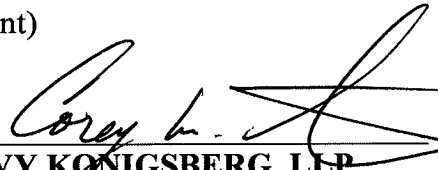
8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimants have experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimants have experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
 - r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - u. Adam Rosenthal, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 4000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 4000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/21/2017

STATEMENT OF FACTS AND BASIS FOR CLAIM

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Jamie Heltzel, as next of friend and mother of four minor children, A.G., B.A., N.F. and O.H., [REDACTED] Flint, MI 48507, claimant's counsel can be contacted at 212-605-6200. Jamie Heltzel has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her children and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: A.G. – [REDACTED] 2014, B.A. – [REDACTED] 2010, N.F. – [REDACTED] 2000, O.H. – [REDACTED] 2014

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.

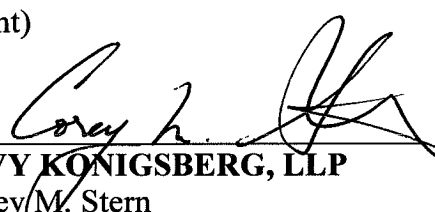
8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimants have experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimants have experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
- m. Ron Fonger, Investigative Reporter for MLive Media Group, 540 S. Saginaw St, 101 Flint, MI 48502
- n. Dayne Walling, Former Mayor of Flint, C/O City of Flint Corporation Counsel, Flint MI
- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI

- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI
 - q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
 - r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - t. Brad Wurfel, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - u. Adam Rosenthal, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 8000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 8000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/21/2017

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: James Thomas Jr, as next of friend and father of three minor children, J.T.1, J.T.2 and J.T.3, [REDACTED] Flint, MI 48505, claimant's counsel can be contacted at 212-605-6200. James Thomas Jr has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent his children and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: J.T.2 – [REDACTED] 2008, J.T.3 – [REDACTED] 2004, J.T.1 – [REDACTED] 2013

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

7. Time of accident: Notice was first provided to EPA by Ms. Burgess on October 14, 2014 at 9:07 a.m. via email; in January 2015 Ms. LeeAnne Walters provided notice over the phone.


8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimants have experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimants have experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

11. Witnesses:

- a. Gina McCarthy, US EPA Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460
- b. Jennifer Kurtz Crooks, Michigan Program Manager, Ground Water and Drinking Water Branch, US EPA, Region 5, 77 West Jackson Blvd, WG-15J, Chicago, Illinois 60604.
- c. Susan Hedman, Former Director of EPA Region 5, C/O EPA
- d. Miguel Del Toral, Regulations Manager, Ground Water and Drinking Water Branch, Region 5
- e. Thomas Poy, Ground Water and Drinking Branch Region 5
- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
- k. Curt Guyette, Investigative Reporter for ACLU of Michigan, 2966 Woodward Ave, Detroit, MI 48201
- l. Lindsey Smith, Investigative Reporter for Michigan Radio 535 W William St, Suite 110, Ann Arbor, MI 48103
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- o. Howard Croft, Former Flint Public Works Director, C/O City of Flint Corporation Counsel, Flint MI
- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

- q. Liane Shekter-Smith, Former Michigan Department of Environmental Quality employee (MDEQ), C/O Attorney General Bill Schuette, Lansing MI
 - r. Pat Cook, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
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 - w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 6000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 6000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/21/2017

STATEMENT OF FACTS AND BASIS FOR CLAIM

**NOTICE OF ADMINISTRATIVE COMPLAINT AGAINST THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**

STANDARD FORM 95 (SF-95) REQUIREMENTS

1. Appropriate Federal Agency: United States Environmental Protection Agency (EPA).

2. Claimant and Claimant's Representative: Jameela James, as next of friend and mother of two minor children, A.H. and Z.T., [REDACTED] Flint, MI 48504, claimant's counsel can be contacted at 212-605-6200. Jameela James has authorized the attorney and law firm listed on the attached SF-95, Exhibit 2, to represent her children and act on their behalf.

3. Type of employment: Minor Children – No Employment

4. Date(s) of Birth: Z.T. – [REDACTED] 2005, A.H. – [REDACTED] 2010

5. Marital Status: Single

6. Date and Day of Accident: As early as Tuesday, October 14, 2014, there is a record that a civilian, Jan Burgess, provided the EPA with notice of a massive environmental violation occurring in her home town of Flint, Michigan. In January 2015, Ms. LeeAnne Walters called the EPA regarding water issues that she was experiencing at her Flint home. She informed the EPA that she and her family members were becoming physically ill from exposure to the water coming from her tap.

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8. Basis of Claim: Negligence. The SF-95 required details are described below.

9. Property Damage: None

10. Nature and extent of each injury: The claimants have experienced physical injury caused by ingesting water contaminated with lead, copper and other toxic materials including but not limited to legionella bacteria, cryptosporidium, E. coli, known carcinogens and lead particulates causing lead poisoning, aggravation and exacerbation of pre-existing and chronic health conditions, gastrointestinal disorders, nausea, hair loss, skin rashes and other dermatological disorders. Claimants have experienced profound emotional distress, overwhelming fear, a persistent and deep interference with all aspects of daily living and the quality of life.

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- f. Michael Schock, Office of Research and Development, Region 5
- g. Darren Lytle, Office of Research and Development, Region 5
- h. Tinka Hyde, Director of Water Division, Region 5
- i. Jeff Kelley, Director, Office of External Communications, Region 5
- j. Rita Bair, Branch Chief Region 5, Ground Water and Drinking Branch, Section 2.
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- p. Michael Glasgow, Flint Utilities Administrator, C/O City of Flint Corporation Counsel, Flint MI

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 - s. Stephen Busch, Former MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
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 - v. Michael Prysby, MDEQ employee, C/O Attorney General Bill Schuette, Lansing MI
 - w. Dr. Marc Edwards, Professor and Environmental Engineer, Virginia Tech University, Blacksburg, VA.
 - x. Dr. Mona Hanna-Attisha, Pediatrician C/O Hurley Medical Center, Flint MI
 - y. Jim Ananich, Michigan District 27 Senate Democratic Leader, Lansing, MI
 - z. Dan Kildee, U.S. Representative, Washington DC
 - aa. U.S. Senator Debbie Stabenow, Washington DC
 - bb. U.S. Senator Gary Peters, Washington DC
12. A. Property Damage Claim: None
- B. Personal Injury Damage Claim: 4000000
- C. Wrongful Death Claim: None
- D. Total Damage Claim: 4000000 (at present)
13. A. Signature of duly authorized agent: 
LEVY KONIGSBERG, LLP
Corey M. Stern
800 Third Avenue, 11th Floor
New York, New York 10022
- B. Telephone of agent: 212-605-6200
14. Date of Signature: 4/21/2017

STATEMENT OF FACTS AND BASIS FOR CLAIM